

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAITLYN TIKKUN,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

MOTION TO ADMIT
COUNSEL
PRO HAC VICE

05 CV. 9901 (KMK) (JCF)

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Andrea Ritchie, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

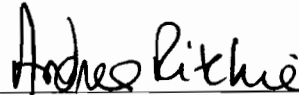
Joey L. Mogul
People's Law Office
1180 N. Milwaukee
Chicago, IL 60622
ph: (773) 235-0070
fx: (773) 235-6699

Joey L. Mogul is a member in good standing of the Bar of Illinois.

There are no pending disciplinary proceedings against Joey Mogul in any State or Federal Court.

Dated: New York, New York
July 17, 2007

Respectfully submitted,



ANDREA J. RITCHIE

(AR2769)

Attorney for Plaintiff Kaitlyn Tikkun
428 Park Place, 2B
Brooklyn, NY 11238
(646) 831-1243

FILED
U.S. DISTRICT COURT
2007 JUL 23 PM 2:34
S.D. OF N.Y.



JUL 23 2007

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CERTIFICATE OF SERVICE

TO: James Mirro, Esq.
NYC Law Department
Attorney for Defendants
100 Church Street
New York, NY 10007

ANDREA J. RITCHIE, an attorney, hereby certifies that she caused a copy of the foregoing motion and attached affidavit to be served on the counsel named above by hand delivery on the 17th day of July, 2007.



ANDREA J. RITCHIE (AR 2769)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
KAITLYN TIKKUN,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.
-----X

**AFFIDAVIT OF
ANDREA RITCHIE IN
SUPPORT OF**

**MOTION TO ADMIT
COUNSEL
PRO HAC VICE**

05 CV. 9901 (KMK) (JCF)

State of New York)
)
County of New York) ss:

ANDREA RITCHIE, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Joey L. Mogul as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in January 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Joey L. Mogul since 2003.
4. Ms. Mogul is a partner at the People's Law Office in Chicago, Illinois
5. I have found Ms. Mogul to be a highly skilled attorney and a person of the utmost integrity. She is experienced in federal civil rights litigation and police misconduct practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Joey L. Mogul, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Joey L. Mogul, *pro hac vice*, which is attached hereto as Exhibit A.


WHEREFORE it is respectfully requested that the motion to admit Joey L. Mogul, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,


Andrea J. Ritchie (AR 2769)

Dated: New York, New York
July 16, 2007

Notarized:


Notary Public 02R16404913
My commission expires: July 16, 2012

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
KAITLYN TIKKUN,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

ORDER FOR
ADMISSION
PRO HAC VICE
ON WRITTEN MOTION

05 CV. 9901 (KMK) (JCF)
-----x

Upon the motion of Andrea J. Ritchie, attorney for Plaintiff Kaitlyn Tikkun, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Joey L. Mogul
People's Law Office
1180 N. Milwaukee
Chicago, IL 60622
ph: (773) 235-0070
fx: (773) 235-6699
JoeyMogul@aol.com

is admitted to practice *pro hac vice* as counsel for Kaitlyn Tikkun in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: New York, New York
July __, 2007

United States District Judge

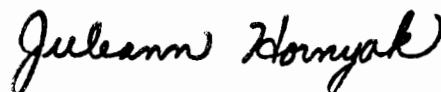
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Joey L. Mogul

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 1997 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Friday, July 13, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Joey L. Mogul

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Joey L. Mogul
was duly admitted to practice in said Court on (12/18/1997)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (07/10/2007)

Michael W. Dobbins, Clerk,

By: David A. Jezwiak
Deputy Clerk